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Attorney for Debtor Aaron Willamette Granum

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In Re:

AARON WILLAMETTE GRANUM,
Debtor.

AARON WILLAMETTE GRANUM,

Plaintiff,

v.

UNIVERSITY OF OREGON,

Defendant.

Case No. 19-32282-pcm7

Adv. Proc. No.

COMPLAINT

JURISDICTION AND THE PARTIES

1.

This Court has jurisdiction under 28 U.S.C. § 1334 because this Complaint arises under Title 11.

Venue is proper because Debtor resides in Oregon.

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2.

Plaintiff Aaron Willamette Granum (“Debtor”) is an individual who resides in Oregon. He filed a Chapter 7 bankruptcy on June 20, 2019, Case Number 19-32282-pcm7.

3.

Defendant University of Oregon is a public university established by Chapter 352 of the Oregon Revised Statutes and is governed by the Board of Trustees of the University of Oregon.

NATURE OF CLAIM

4.

Debtor’s complaint is a core proceeding under 28 U.S.C. § 157(b)(2). Debtor consents to entry of final orders and judgment by the bankruptcy judge in this adversary proceeding.

FACTUAL ALLEGATIONS

5.

Debtor was an enrolled student at the University of Oregon.

6.

Debtor has received one or more collection letters from Defendant and a collection agency working on behalf of Defendant.

7.

Debtor made some payments on the debt owed to Defendant.

8.

Prior to filing this Complaint, Defendant failed to produce any requested documentation relating to the debt owed to Defendant that was requested by Debtor’s attorney.

CAUSE OF ACTION CLAIM ONE

(Determination of Dischargeability – 11 U.S.C. § 523(a)(8))

9.

Defendant cannot meet its burden to establish that the debt is excepted from discharge pursuant to 11 U.S.C. § 523(a)(8).

1 WHEREFORE, Plaintiff/Debtor requests:

- 2 (a) An order determining Debtor's debts to Defendant University of Oregon are
3 discharged because the debt does not meet the definitions listed in 11 U.S.C. §
4 523(a)(8), and
5 (b) For other equitable relief this Court may determine is fair and just.

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7 DATED: September 23, 2019.

8 PETERSON, PETERSON, WALCHLI & ROBERSON LLP

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10 /s/Gregory R. Roberson

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